

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

DORRET FRANCIS, ANTHONY
KENNEDY, and CHRISTINE PEARCE,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

Case No.: 5:18-cv-00583-SLP

v.

APEX USA, INC.; HOTELMACHER,
LLC, dba HOLIDAY INN EXPRESS;
SONTAG, INC. dba HAMPTON INN
CLINTON; STEAKMACHER, LLC, dba
MONTANA MIKE'S STEAKHOUSE;
SCHUMACHER INVESTMENTS, LLC,
dba WATER ZOO INDOOR WATER
PARK; WALTER SCHUMACHER; and
CAROLYN SCHUMACHER,

Defendants.

**JOINT MOTION FOR ENTRY OF
PROTECTIVE ORDER PURSUANT TO RULE 26(c)**

Plaintiffs Dorret Francis, Anthony Kennedy, and Christine Pearce and
Defendants Apex USA, Inc., Hotelmacher LLC, Sontag, Inc., Steakmacher, LLC,
Schumacher Investments, LLC, Walter Schumacher, and Carolyn Schumacher
respectfully move this Court to enter a protective order pursuant to Federal Rule of Civil
Procedure 26(c) designating certain discovery materials as confidential. In support of
this motion, the parties state as follows:

1. The parties and third parties may have confidential or proprietary information within their possession, custody or control that is relevant to the claims and defenses involved in this case.

2. The parties have conferred in good faith about a protective order related to discovery materials and agree to the terms of the proposed order.

3. The proposed Protective Order is being submitted contemporaneously to the Court in accordance with the instructions set forth in Section II.G. of the Electronic Filing for Civil and Criminal Cases Policies & Procedures Manual for the United States District Court, Western District of Oklahoma.

WHEREFORE, the parties respectfully request that this Court enter the proposed Protective Order.

Dated: August 16, 2019

Respectfully Submitted,

/s/ Catherine Fisher

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